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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT REMOVAL
AND UPGRADE OF UNDERGROUND STORAGE TANK AND INTERIM REMEDIAL ACTION
AT GOLF COURSE MAINTENANCE YARD NAS FORT WORTH TX
1/12/1996
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



**NAVAL AIR STATION
FORT WORTH JRB
CARSWELL FIELD
TEXAS**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 370

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File: 17A-72
A.F.

370

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

January 12, 1996

CERTIFIED MAIL

Mr. Charles A. Rice
Team Chief
Base Closure Restoration Division
Air Force Center for Environmental Excellence
8001 Inner Circle Drive, Suite 2
Brooks AFB, Texas 78235-5328

Re: Regulatory Review of Draft Report - Removal/Upgrade of Underground Storage Tanks and Interim Remedial Action at the Golf Course Maintenance Yard at NAS Ft. Worth JRB (Tarrant County), Texas

Dear Mr. Rice:

We have completed our review of the Draft Report - Removal/Upgrade of Underground Storage Tanks and Interim Remedial Action at the Golf Course Maintenance Yard at NAS Ft. Worth JRB (formerly Carswell AFB) dated October 1995. After careful review of all the information provided, the following comments concerning the UST removals and upgrades portion of the draft report are provided for your review:

1. Work Plan:

UST Removals and Upgrades:

A map illustrating the locations of the USTs to be removed would be helpful.

Notification should be provided to the Texas Natural Resource Conservation Commission (TNRCC) Region 4 Field Office by way of 30 day notice of construction and 24 to 72 hour verbal notification prior to each removal/upgrade activity so that a TNRCC representative can be present on site. Reference to TNRCC notification was found in the Construction Quality Plan but was not mentioned in the Work Plan.

After removal or upgrade of a UST battery is completed, an updated TNRCC PST registration form should be separately submitted to TNRCC Region 4 and to TNRCC PST Registration Section to note the change in status of each UST system. This task was not included in the draft report.

Please indicate if the planned UST upgrades are designed to bring the UST systems up to date with required technical standards or if the USTs will be upgraded to full 1998 standards for leak detection, spill and overspill

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protection, and cathodic protection. If additional upgrades will be necessary in the future to bring the USTs up to 1998 standards, please indicate what additional work will be needed on each tank battery.

According to the work plan, the UST piping systems will not be physically removed from the ground but will be grouted in place. Although removal of piping is not a regulatory requirement, adequate release determination sampling from the vicinity of the UST system and associated piping and dispenser equipment will be needed to properly close each UST battery. The soil sampling plan indicates that samples will only be collected from the sidewalls and floor of each UST excavation but not from the associated pipechases and dispenser locations. In situations where large amounts of piping make removal impractical, the release determination sampling can be accomplished through the installation of soil borings. The most common and cost effective approach used by UST removal contractors is to remove the associated piping and collect composite soil samples along the straight runs and at the elbows of the pipechases as well as at the dispenser locations.

The use of a PID with a 10.2 eV lamp was indicated as the field screening tool to determine the limits of soil contamination. Since the majority of the USTs scheduled for removal are reported to have contained jet fuel, waste oil, and diesel, a flame ionization detector (FID) or a PID with an 11.7 eV lamp would be preferable for field screening as these are more sensitive to contamination resulting from heavier petroleum distillates.

The work plan indicated that one soil sample would be collected from the vicinity of each of the USTs scheduled to be upgraded. Please clarify if these samples are to be collected from native soil or UST backfill material. Additionally, the purpose that the proposed samples will serve is uncertain as residual contamination of backfill material around fill ports of USTs is typically encountered due to minor overspills from historical loading operations.

2. Construction Quality Plan:

UST Removals and Upgrades:

Comments regarding sampling of pipechases, dispenser locations, and fill port areas are addressed in part 1 above. Likewise, comments regarding TNRCC notification, registration form reporting, field screening tools, and required upgrades are also addressed above.

3. Quality Assurance Project Plan:

UST Removals and Upgrades:

Reference is made to requirements by the Air Force (such as form 103 regarding drilling of boreholes) that have to be met prior to conducting on-site work, but very little mention is made of the requirements that the Navy has regarding clearance to proceed with on-site work. Since the base is now operated by the Navy, both Air Force and Navy requirements should be met and personnel from both parties should be included in the lines of communications before and during construction, assessment, and remediation at the base.

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4. Health and Safety Plan:

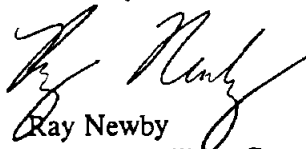
No additional comments.

5. General Comments:

The format for the final report of findings was not included in the draft work plan. Since the final report will serve as UST closure documentation for the UST batteries removed from the ground, it would be preferable if the site-specific details of construction, release determination sampling, overexcavation, analytical findings, and waste disposition could be combined for each UST battery/site in the text portion of the report instead of grouping constructions details for all sites together followed by analytical results for all sites. The preferred format allows the reviewer to locate the pertinent information for each site within a few paragraphs or pages. The appendices could still be organized by general topic such as laboratory documentation, waste manifests, etc.

Should you have any questions, please contact me at 512/239-2200. Your cooperation in this matter is appreciated.

Sincerely,



Ray Newby
Federal Facilities Coordinator, Remediation Unit I
Responsible Party Remediation Section
Petroleum Storage Tank Division

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carswust.rev

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Gary Baumgarten, USEPA Region 6
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Geof Meyer, TNRCC Industrial and Hazardous Waste Division
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